

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

Parker O’Neil Wideman,

Plaintiff,

v.

Innovative Fibers, LLC and Stein Fibers, Ltd.,

Defendants.

Case No. 7:22-cv-00418-DCC

Riley C. Draper,

Plaintiff,

v.

Innovative Fibers, LLC and Stein Fibers, Ltd.,

Defendants.

Case No. 7:22-cv-00419-DCC

William F. Douglass and Jessica L. Douglass,

Plaintiffs,

v.

Innovative Fibers, LLC and Stein Fibers, Ltd.,

Defendants.

Case No. 7:22-cv-00420-DCC

**DEFENDANT STEIN FIBERS, LTD.’S MOTION TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Fed. R. Civ. P. 12(b)(2), Defendant Stein Fibers, Ltd. (“Stein Fibers”) moves for an Order dismissing the claims filed by Plaintiffs Parker O’Neil Wideman, Riley C. Draper, William F. Douglass and Jessica L. Douglass (collectively, “Plaintiffs”) against it in the above-captioned lawsuits. This motion is made on the grounds that this Court lacks personal jurisdiction

over Stein Fibers, Ltd, a corporation organized under New York law with no relationship to the alleged contract or incident at issue in the three lawsuits. The motion is based on the memorandum of law, including attached exhibits, filed herewith; the Court's record in the three matters; and any additional argument that may be presented to the Court.

Respectfully submitted,

s/ H. Sam Mabry, III

H. Sam Mabry, III, Fed. ID No.: 3252

Email: smabry@hsblawfirm.com

Jonathan D. Klett, Fed. ID No.: 12858

Email: jklett@hsblawfirm.com

**HAYNSWORTH SINKLER BOYD, P.A.**

ONE North Main Street, 2<sup>nd</sup> Floor (29601)

Post Office Box 2048

Greenville, SC 29602

Tel: (864) 240-3200

Fax: (864) 240-3300

K. Lindsay Terrell, Fed. ID No.: 4045

Chad M. Graham, Fed. ID No.: 11569

**The Ward Law Firm, P.A.**

Post Office Box 5663

Spartanburg, SC 29304

Tel: (864) 573-8500

Fax: (864) 585-3090

*ATTORNEYS FOR DEFENDANTS INNOVATIVE  
FIBERS, LLC AND STEIN FIBERS, LTD.*

March 3, 2022  
Greenville, South Carolina